

[Counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
GRANTING PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
STATEMENT OF RECENT DECISION**

Pursuant to Local Civil Rules 7-11 and 7-12, Plaintiffs and Defendants Adobe Systems, Inc., Apple Inc., Google Inc., and Intel Corp. ("Defendants") jointly submit this Stipulation and Proposed Order allowing Plaintiffs to file a Statement of Recent Decision.

WHEREAS Plaintiffs wish to file a Statement of Recent Decision in order to bring to the Court's attention the decision of Judge Samuel Conti of the Northern District of California, *In re: Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917, Case No. C-07-5944-SC (September 24, 2013).

WHEREAS Defendants do not stipulate that the decision is relevant, Defendants also do not oppose the filing of Plaintiffs' Statement of Recent Decision.

Therefore, subject to the approval of this Court, Plaintiffs and Defendants hereby stipulate and agree to the filing of Plaintiffs' Statement of Recent Decision.

Dated: September 25, 2013 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

By: /s/ Kelly M. Dermody
Kelly M. Dermody

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
Lisa J. Cisneros (State Bar No. 251473)
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008

1 Dated: September 25, 2013 JOSEPH SAVERI LAW FIRM, INC.

2
3 By: /s/ Joseph R. Saveri
Joseph R. Saveri

4 Joseph R. Saveri (State Bar No. 130064)
5 Lisa J. Leebove (State Bar No. 186705)
6 James G. Dallal (State Bar No. 277826)
7 255 California, Suite 450
8 San Francisco, CA 94111
9 Telephone: 415. 500.6800
10 Facsimile: 415. 395.9940

11 *Co-Lead Counsel for Plaintiff Class*

12
13 Dated: September 25, 2013 O'MELVENY & MYERS LLP

14 By: /s/ George A. Riley
George A. Riley

15 George A. Riley
16 Michael F. Tubach
17 Christina J. Brown
18 Two Embarcadero Center, 28th Floor
19 San Francisco, CA 94111
20 Telephone: 415.984.8700
21 Facsimile: 415.984.8701

22 *Attorneys for Defendant APPLE INC.*

23 Dated: September 25, 2013 JONES DAY

24 By: /s/ David C. Kiernan
David C. Kiernan

25 Robert A. Mittelstaedt
26 Craig A. Waldman
27 David C. Kiernan
28 555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: 415.626.3939
Facsimile: 415.875.5700

Attorneys for Defendant ADOBE SYSTEMS, INC.

1 IT IS SO ORDERED.

2
3 Dated:

By:

HON. LUCY H. KOH
UNITED STATES DISTRICT COURT JUDGE